

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ROBERT PATRICK LEWIS,)
 PHILIP A. LUELSDORFF and)
 1AP, INC.,)
)
 Plaintiffs,)
)
 v.)
)
 SETH ABRAMSON,)
)
 Defendant.)

Case No.: 1:22-CV-00126-PB

**DEFENDANT’S MOTION TO COMPEL PLAINTIFF ROBERT PATRICK LEWIS
TO SUPPLEMENT HIS DISCOVERY RESPONSES**

NOW COMES the Defendant, Seth Abramson, by and through his attorneys, Getman, Schulthess, Steere & Poulin, P.A., and respectfully requests that pursuant to Fed. R. Civ. P. 37 the Court compel Plaintiff Robert Patrick Lewis to supplement his discovery responses. In support thereof, the Defendant states as follows:

1. The Defendant propounded discovery requests on Lewis in the form of requests for production and two sets of interrogatories.
2. Lewis’s responses are deficient.
3. Despite defense counsel’s good faith efforts to confer with Lewis’s counsel to address the identified deficiencies, Lewis has not supplemented his responses.
4. For the reasons set forth more fully in the accompanying Memorandum in support of this Motion, which is hereby incorporated into this motion, the Defendant asks the Court to compel Lewis to supplement his discovery responses.

5. Additionally, the Defendant respectfully requests that the Court award the Defendant his reasonable expenses incurred in making this motion, including attorney's fees.

WHEREFORE, the Defendant, Seth Abramson respectfully requests that the Court:

- A. COMPEL Plaintiff Robert Patrick Lewis to supplement his discovery responses as set forth more fully in the accompanying Memorandum;
- B. AWARD the Defendant his reasonable expenses in making this motion, including attorney's fees; and
- C. GRANT such other relief as justice may require.

Respectfully submitted,

Defendant,

SETH ABRAMSON

By His Attorneys,

Getman, Shulthess, Steere & Poulin, P.A.

April 23, 2025

/s/ Geoffrey M. Gallagher
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CERTIFICATE OF SERVICE

The foregoing was served on the parties identified below using the Court's CM/ECF system on April 23, 2025:

Steven S. Biss, Esq.
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Charlottesville, VA 22903

April 23, 2025

/s/ Geoffrey M. Gallagher

Geoffrey M. Gallagher, Esq.